

OR

CHARLES A. BROOKE, DIRECTOR



## MONTANA DEPARTMENT OF COMMERCE

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A SPECIAL REPORT  
TO THE GOVERNOR

Prepared By The  
INTERIM ADVISORY COMMITTEE  
FOR PUBLIC INPUT ON  
THE PROPOSAL TO CREATE A  
MONTANA DEPARTMENT OF TRANSPORTATION ,

July 1990

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## INTRODUCTION

On May 9, 1990 Governor Stan Stephens announced the appointment of an eleven-member task force to solicit and report on public comment concerning the creation of a Montana Department of Transportation (D.O.T.).

The Governor's announcement came on the heels of his acceptance of a feasibility report prepared by the Montana Highway Commission and other State agencies involved in transportation services. That report recommended that a Montana D.O.T. be formed to bring all of State government's transportation functions under one administrative roof. Currently these functions are scattered among five separate State agencies.

The Governor has indicated that the effort to solicit public comment is the second extremely important step in designing a D.O.T. to fit Montanan's needs. The purpose the Governor outlined for this Committee and its proposed hearings was to solicit public input from around the State, both pro and con, and from the perspective of both the user and provider.

The following is the formal report prepared for the Governor on the public input obtained by the Committee through testimony received at public hearings and written comments that have been submitted in writing.



## PROCEDURE

The eleven-member Committee appointed by the Governor was chaired by Charles A. Brooke, Director of the Montana Department of Commerce. (A list of the full Committee membership appears as Attachment A to this Report.)

The Committee held public hearings on June 11th in Helena, Missoula, and Kalispell. On June 12th hearings were also held in Havre, Glendive, and Billings. Announcement of the hearing schedule was by press release mailed directly to all newspapers and radio stations in the State, as well as the capitol news services. These announcements invited public comment at the hearings as well as written comment which could be submitted by mail directly to the Committee Chairman by any party unable to attend one of the scheduled hearings.

In addition to the press release, the Commerce Department and Highway Department employed a direct mailing of the notice to roughly four hundred individuals and agencies involved or interested in transportation in Montana. Members of the State Legislature also received notice by mail announcing the hearing schedule.

The format for the public hearings provided for attendees to sign in and to receive a summary report of the D.O.T. Feasibility Assessment prepared by the Montana Highway Commission. (See Attachment B for sample copy.)

Prior to opening the hearing for public testimony, Chairman Brooke introduced the Committee members and briefly outlined the purpose for the hearing; the Governor's goals and objectives for a D.O.T.; and the recommendations contained in the Highway Commission report. The proceedings of each of the hearings, including all the public testimony, were recorded on audio tape for future reference.





## PUBLIC INPUT

Approximately ninety-two people attended the public hearings conducted by the Committee, with thirty-nine people actually offering testimony. In addition to the testimony presented at the hearings, written reports and comments were also received from eight individuals, groups, and agencies. (See Attachment C.)

In reviewing the public input received, both orally and in writing, it is clear that the comments generally come from four basic perspectives which are summarized below:

### Railroad Interests

Transportation planners and rail shippers generally testified to the importance of the State's railroad program and expressed concern that the rail aspect of transportation not be lost in a "super" highway department. The need for multi-modal planning and coordination through a D.O.T. was heartily endorsed.

### Aviation Interests

The State's aviation industry was well represented during the hearing process. While they did embrace the general concept of a D.O.T., they too expressed concern about their interests being overshadowed by the Highway Department interests. They were also concerned that aviation interests be represented on any public board responsible for overseeing the operation of the D.O.T. Finally, they were concerned that the revenue generated by the aviation gas tax not be used for anything other than the State's aviation program.



### Special Transportation Interests

The operators of Montana's special transportation programs for the disabled and elderly were especially concerned that the passenger transportation functions currently operated by the Department of Commerce not be cut back or "lost" in a larger D.O.T. organization. They felt the continuation of the division's specialized expertise over and above the basic grant administration was of critical importance to the local operation of specialized transportation services for the elderly and disabled.

### Taxpayer Interests

The concerns of the general taxpayer hinged on the fear of the creation of a larger, less responsive, more expensive government agency. Despite arguments to the contrary, there is a sense on the part of some of the public that more bureaucracy and cost to the taxpayer are the inevitable end result of this type of reorganization. As one State legislator put it, "My desire is to see a D.O.T. that serves the people and not the government."

### Miscellaneous

While the overall need for coordinated transportation policy and program administration for the State was widely endorsed, subject to the concerns outlined above, there were other related issues raised that need to be recognized.

Several officers of the current Montana Highway Department Gross Vehicle Weights (GVW) Division testified to the law enforcement aspect of their work and suggested that the GVW function be moved to the Department of Justice.



The Montana Motor Carrier Association (MMCA) provided a detailed assessment of the Highway Commission's Report both orally and in writing (See Attachment C). They generally supported the concept of a D.O.T. but raised some questions about the technical operation. The most significant issue raised involved the administration of the "Bingo Stamp" function by the Public Service Commission which the MMCA opposed being moved to a new D.O.T.

The written comments attached to this report deserve to be reviewed in detail and given serious and consideration in regards to some of the more technical questions raised and suggestions offered.



## EVALUATION

While the Governor's charge to the Committee was simply to solicit and report on public input regarding the general concept of creating a new Department of Transportation in Montana, the Committee feels it is also appropriate to at least provide a brief evaluation of the comments relative to the next step in the Governor's planning process.

As a result of the public input received, it is clear that there are four general aspects of the organization's plan which need to be responsive to the public concerns:

1. Organization - Special attention needs to be paid to insure that all transportation interests in the State are appropriately represented on the organizational chart for the new D.O.T. (An organization based on transportation modes would be appropriate.)
2. Funding - No mode should be perceived as subsidizing another. The highway interests appear adamant that highway user taxes, motor fuel taxes, and GVW fees should not be used for non-highway purposes. Similarly, the State's aviation industry is equally concerned that the revenue from the aviation fuel tax not be used for any transportation program other than aviation.
3. Cost and Size - Taxpayers simply want to see better service, increased efficiency, and reduced costs -- but not bigger government. This could present an interesting challenge from the perspective that any potential increases to the gas tax as a result of changing federal policy may make it look like a D.O.T. is costing more. For that reason the efficiency issue needs to be the focus in this area as we talk about the purpose of a D.O.T. being to improve the





efficiency and effectiveness of how we spend the taxpayer's money ("More bang for the buck").

4. Representation - The issue of public board representation, relative to overseeing the management of the State's transportation program as envisioned through a D.O.T., will undoubtedly be a sensitive political issue. In principal, any D.O.T. board or commission should include representation from all modes of transportation and possibly reflect geographic balance in the State as well.



## SUMMARY

There are a variety of special interests associated with the transportation industry in Montana. All of these interests have specialized needs and concerns as they relate to the creation of a Department of Transportation. These interests will undoubtedly play an active role during the legislative session to protect their interests.

Based on the input collected through the foregoing process, many of these issues and concerns have been identified. Full consideration of these issues and concerns during the development of a final proposal on a D.O.T. for the next legislative session could serve to create potential support, where otherwise there might have been opposition.

The general public concern about bigger government and more costs will always be an overriding concern relative to a reorganization of this magnitude. While the Governor's commitment to reducing costs and the size of government through this process have been made clear to this Committee, it must also be made clear to the public to calm their fears.

There is no doubt in the Committee's mind that there is broad support and agreement on the concept of a D.O.T. The challenge now is to develop an operational plan that implements the agreed-upon principles while meeting the specialized needs of all the special interests involved.



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A Brief Summary  
of the  
Department of Transportation  
Feasibility Assessment  
Prepared by the  
Montana Highway Commission  
April 1990

## INTRODUCTION

In October of 1989, Governor Stan Stephens requested the Montana Highway Commission to investigate the feasibility of creating a Department of Transportation (DOT) for the state of Montana.

Forty-five other states have already formed Department's of Transportation incorporating a wide range of transportation activities. The expressed goals of Governor Stephens in exploring the feasibility of a DOT for Montana are as follows:

- 1) To improve Montana's multi-modal transportation planning by consolidating into a single agency all those transportation-related functions that include planning, development and safety for the purpose of offering a "unified vision of Montana's transportation needs for the 21st century;"
- 2) To insure that adequate, safe and efficient transportation facilities and services of all modes are available within the state to support and promote economic growth;
- 3) To enhance public service and convenience by providing "one-stop shopping" for licenses, fees, taxes and registrations relating to transportation;
- 4) To improve overall government efficiency and reduce costs by streamlining services and eliminating duplicate efforts and programs.

## RECOMMENDATIONS

In April of 1990 the Montana Highway Commission submitted their formal report to Governor Stephens on the feasibility of consolidating a variety of transportation-related functions into a DOT. This report was based on input from the Departments of Commerce, Revenue, Justice, Highways and the Public Service Commission.





The Montana Highway Commission made the following recommendations to the Governor:

1) Based on our study, the Montana Highway Commission recommends that a DOT be created for Montana for the purpose of providing Montana with an effective and coordinated multi-modal transportation planning and development program.

2) In keeping with this purpose, it is imperative that the Divisions of Aeronautics and Transportation, that are currently part of the Department of Commerce, and the Montana Department of Highways be incorporated as the primary functionaries of the DOT.

The Aeronautics Division should remain in its present location. The division owns the facilities that were paid for by Aeronautics earmarked revenue.

3) For the purpose of improving public convenience, eliminating duplication and improving the effective use of tax dollars, we recommend that the Motor Fuels Tax Division of the Department of Revenue, the motor carrier registration/stamp function of the Public Service Commission and the Motor Carrier Safety Assistance program from the Department of Justice also be included in the DOT.

Inclusion of these units in the DOT represents an important step toward providing more convenient "one-stop" service for transportation users and elimination of duplicate efforts among agency units.

4) We believe that the Montana Highway Patrol should not be included in a DOT since its primary function is law enforcement. However, the Motor Vehicle and Highway Traffic Safety Divisions of the Department of Justice deserve further consideration for possible inclusion in a DOT sometime in the future. From the standpoint of public convenience, having a single location to seek drivers licenses, vehicle titles and licenses, and size, weight and fuel permits makes sense.

Some safety activities are very similar to those conducted by Highway Department staff. Although no actual duplications exist between departments, many of the processes are similar which could provide opportunities for some consolidations. Current procedures are tightly interwoven with the processes of other units in the Department of Justice. As a result, their removal would take considerable effort and most likely prove to be quite disruptive. We, therefore, recommend that these units not be included in the DOT at this time. These units could be reconsidered at a later date.



## SUMMARY

From the outset of the DOT evaluation process, Governor Stephens has specifically instructed the participants in the study that he is opposed to simply building another bureaucracy. Through the consolidation and improved coordination of existing transportation programs and services, the Governor is committed to generating cost savings for the taxpayer.

In developing a specific proposal for the creation of a DOT in Montana, Governor Stephens feels that public input in the planning process is imperative in that, without acceptance from its users and beneficiaries, a Department of Transportation will not succeed or bring the benefits the Governor sees as possible.



To: Governor Stan Stephens

From: Montana Highway Commission

Date: April 16, 1990

Subject: Department of Transportation Feasibility

(Footnote: MMCA COMMENTS ARE INCLUDED IN ALL CAPS)

In response to your request for a comprehensive review of the feasibility of establishing a Department of Transportation (DOT) to absorb the current function of the Montana Department of Highways and such other agencies and programs within state government as would be appropriate, we submit the following report and recommendations:

#### RECOMMENDATIONS

1) Based on our study (see attached DOT Feasibility Assessment), the Montana Highway Commission recommends that a DOT be created for Montana for the purpose of providing Montana with an effective and coordinated multi-modal transportation planning and development program.

MMCA COMMENTS: - WOULD BE IN GENERAL SUPPORT OF CREATION OF DOT, HOWEVER MMCA WOULD BE CONCERNED AS TO ACTUAL APPLICATION OF MULTI-MODAL TRANSPORTATION AND ITS MEANING. THE ONLY REFERENCE TO MULTI-MODAL IN THE FEASIBILITY STUDY REFERS TO RAIL PROGRAM AND WATERWAYS. INCLUSION OF MOTOR CARRIAGE WITHIN MULTI-MODAL TRANSPORTATION DISCUSSION IS LACKING IN THE FEASIBILITY STUDY AND PRESUMABLY WAS NOT STUDIED. MMCA RECOMMENDS FURTHER STUDY AND PLANNING FOR INCLUSION OF MOTOR CARRIAGE INTO A MULTI-MODAL TRANSPORTATION SYSTEM WITHIN A PROPOSED DOT.

IN THE "PLUSES" OF A DOT STRUCTURE OUTLINED IN THE STUDY, IT STATES;

"A DOT could develop combined support for increasing and more evenly distributing fuel tax monies for all transportation modes."

MMCA STRONGLY OPPOSES THE USE OF CURRENT HIGHWAY USER TAXES..FUEL TAXES, GVW FEES, AND OTHERS FOR THE SUPPORT OF NON-HIGHWAY RELATED TRANSPORTATION FUNCTIONS WITHIN A DOT. IF THE REFERENCE INCLUDES THE ASSESSMENT OF "FUEL TAX MONIES" ON FUELS NOW CONSUMED BY RAILS AND OTHER NON-HIGHWAY MODES IN MONTANA, FOR EXAMPLE, THAN THE OPPOSITION WOULD BE LESSEned OR ELIMINATED.

2) In keeping with this purpose, it is imperative that the Divisions of Aeronautics and Transportation, that are currently part of the Department of Commerce, and the Montana Department of Highways be incorporated as the primary functionaries of the DOT. The Aeronautics Division should remain in its present location. The Division owns the facilities that were paid for by Aeronautics earmarked revenue.

MMCA COMMENTS: - NO COMMENT

3) For the purpose of improving public convenience, eliminating duplication and improving the effective use of tax dollars, we recommend that the Motor Fuels Tax Division of the Department of Revenue, the motor carrier registration/stamp function of the Public Service Commission and the Motor Carrier Safety Assistance Program from the Department of Justice also be included in the DOT. Inclusion of these units in the DOT represents an important step toward providing more convenient "one-stop" service for transportation users and elimination of duplicate efforts among agency units.

MMCA COMMENTS: - MMCA WOULD SUPPORT THE MOVEMENT OF THE DIESEL FUEL TAX COLLECTION FUNCTION FOR ON ALL PRO-RATED REGISTERED VEHICLES IN THE INTERNATIONAL REGISTRATION PLAN FROM DEPARTMENT OF REVENUE TO DOT. MMCA ADVOCATED SUCH A MOVE IN THE LEGISLATURE AS MEANS OF CREATING "ONE STOP SHOPPING" CONVENIENCE AND TO FACILITATE THE IMPLEMENTATION OF THE INTERNATIONAL FUEL TAX COMPACT ADOPTED BY MONTANA. IT WOULD APPEAR NOT TO BE NECESSARY

TO MOVE THE ENTIRE MOTOR FUEL TAX DIVISION TO DOT TO FACILITATE ONE STOP SHOPPING FOR MOTOR CARRIERS. HOWEVER SUCH A DECISION BY THE LEGISLATURE AND ADMINISTRATION WOULD NOT BE OPPOSED BY MMCA.

MMCA WOULD OPPOSE THE MOVING OF THE MOTOR CARRIER REGISTRATION/STAMP FUNCTION OF THE PUBLIC SERVICE COMMISSION TO THE DOT. THE CURRENT USE OF THE REVENUES FROM THIS SOURCE IS INTENDED FOR USE IN THE PSC'S ENFORCEMENT OF REGULATED MOTOR CARRIERS. THE LEGISLATURE CHANGED THE FUNDING MECHANISM OF PSC BUT DID NOT CHANGE THE PSC'S AUTHORITY TO ASSESS THE REGISTRATION STAMP FEE AUTHORITY. THE STATUTORY AUTHORITY TO REGULATE ALL "FOR HIRE" MOTOR VEHICLES OPERATING ON THE PUBLIC HIGHWAYS GIVES PSC THE RIGHT TO ASSESS A FEE ON EACH MOTOR VEHICLE OPERATED BY CARRIERS OVER THE PUBLIC HIGHWAYS OF THIS STATE TO SERVE TO REGISTER AND IDENTIFY SUCH VEHICLE THROUGH THE UNIFORM IDENTIFICATION CAB CARD PROGRAM.

NOT ALL CARRIERS PAY THE FEE. ONLY REGULATED CARRIERS PAY THE FEE, NON REGULATED, PRIVATE, AND EXEMPT COMMODITY CARRIERS DO NOT PAY THE FEE. THE ONE STOP SHOPPING CONCEPT WOULD NOT APPLY HERE. MMCA SEES NO PARTICULAR ADVANTAGE TO THIS MOVE SINCE, ALL OTHER REGULATORY FUNCTIONS OF PSC WOULD REMAIN IN THE PSC. THE COMMENT IN THE FEASIBILITY ASSESSEMENT RELATING TO ATA'S REVIEWING OF THE STATE'S USE OF SO CALLED "BINGO STAMPS" TO AMEND OR END ITS USE IS AN INAPPROPRIATE COMMENT. MMCA HAS NOT ESTABLISHED ANY POLICY RELATING TO A POSITION ON THIS MATTER. AS OF NOW NO SUCH EFFORT BY ATA IS CONTEMPLATED WITHOUT MMCA'S CONSENSUS. HOWEVER BECAUSE IF SUCH AN EFFORT IS CONSIDERED IN THE NEAR FUTURE, THE TRANSFER OF THE REGISTRATION/STAMP FUNCTION TO A DOT SHOULD NOT BE CONSIDERED AT THIS TIME.

MMCA WOULD GIVE TACIT SUPPORT FOR PLACING THE MOTOR CARRIER SAFETY ASSISTANCE PROGRAM (MCSAP) INTO A DOT FROM THE DEPARTMENT

OF JUSTICE. HERE IT IS TO PRESUMED THAT THE ENTIRE COMPLIMENT OF STAFF NOW OPERATING THE MCSAP UNDER THE MONTANA HIGHWAY PATROL WOULD BE TRANSFERED TO THE DOT. ALTHOUGH MONTANA LAW AUTHORIZES THE GVW OFFICERS TO CONDUCT SAFETY INSPECTIONS OF CARRIER VEHICLES, THE PRIME RESPONSIBILTY REMAINS IN THE PATROL'S SPECIALLY TRAINED MCSAP DIVISION. MMCA SUPPORTS THE CONTINUATION OF THIS SETUP WITHIN A DOT.

4) We believe that the Montana Highway Patrol should not be included in a DOT since its primary function is law enforcement. However, the Motor Vehicle and Highway Traffic Safety Divisions of the Department of Justice deserve further consideration for possible inclusion in a DOT sometime in the future. From the standpoint of public convenience, having a single location to seek drivers licenses, vehicle titles and licenses, and size, weight and fuel permits makes sense.

Some safety activities are very similar to those conducted by Highway Department staff. Although no actual duplications exist between departments, many of the processes are similar which could provide opportunities for some consolidations. Current procedures are tightly interwoven with the processes of other units in the Department of Justice. As a result, their removal would take considerable effort and most likely prove to be quite disruptive. We, therefore, recommend that these units not be included in the DOT at this time. These units could be reconsidered at a later date.

MMCA COMMENTS;- MMCA DOES NOT DISAGREE WITH CURRENT PLACEMENT OF THE MONTANA HIGHWAY PATROL. THE STUDY POINTS UP PLUSSES TO THE EFFECT THAT;

"Better coordination of truck size, weight and safety enforcement, training in these areas would also be consolidated with GVW, MCSAP, and PSC. The training benefit would be of little value to the 200 sworn MHP officers, as the training of these officers to perform their duties is quite different."



MMCA STRONGLY AGREES WITH THE FIRST PART OF THE ABOVE QUOTE BUT DISAGREES WITH THE LATTER PART OF THE QUOTE.

UNDER CURRENT LAW, BOTH THE MHP OFFICERS AND GVW OFFICERS ARE CHARGED WITH THE ENFORCEMENT OF MOTOR CARRIER SAFETY. IF IT IS ANTICIPATED THAT LEGISLATION WOULD REMOVE THE SAFETY ENFORCEMENT FROM THE MHP AND MAKE THAT ENFORCEMENT THE EXCLUSIVE FUNCTION OF THE DOT, MMCA WOULD BE OPPOSED. MMCA FEELS THAT ENFORCEMENT OF MOTOR CARRIER SAFETY ON THE HIGHWAYS IN MONTANA SHOULD REMAIN IN THE MHP AS WELL AS GVW UNDER A DOT. THEREFORE THE SAFETY ENFORCEMENT TRAINING SHOULD REMAIN FOR MHP AS WELL AS GVW OFFICERS. ONE HUNDRED PER CENT OF THE MHP OFFICERS' SALARIES ARE PAID FROM HIGHWAY USER FEES, FUEL TAXES, GVW FEES AND OTHERS. PSC, HOWEVER, SHOULD NOT BE INCLUDED IN MOTOR CARRIER SAFETY ENFORCEMENT FOLLOWING LEGISLATIVE ACTION IN 1985 TO REMOVE PSC FROM THIS FUNCTION.

MMCA FEELS THAT AN IMPORTANT INCLUSION TO THE DOT PROPOSAL AT THIS TIME WOULD BE THE INCLUSION OF THE MOTOR VEHICLE DIVISION DRIVER SERVICES AND DRIVER INFORMATION BUREAUS FROM THE STANDPOINT OF THE COMMERCIAL DRIVERS LICENSE PROGRAM. TO ACHIEVE COMPLETE "ONE STOP SHOPPING". MONTANA HAS IMPLEMENTED THE CDL PROGRAM AND IS TESTING UNDER FEDERAL DOT GUIDELINES FOR COMMERCIAL DRIVERS. MONTANA HAS NOT YET COMPLIED WITH FEDERAL DOT'S CHANGES IN COMPUTERIZED RECORDKEEPING SYSTEMS TO MATCH UP WITH THE COMMERCIAL DRIVER LICENSE INFORMATION SYSTEM (CDLIS). THIS IS A FEDERAL DOT PROGRAM AND SHOULD BE INCORPORATED INTO A MONTANA DOT PROPOSAL TO MORE EFFECTIVELY MEET THE FEDERAL DEADLINES.

### CONCLUSION

As a result of our research and meetings with the other agencies affected by these recommendations, it is very realistic to expect that an effective and efficient DOT could be achieved through the consolidation of programs

and functions outlined above. We have not identified any major or unsurmountable obstacles to implementation and, in fact, remain convinced that the benefits of this effort will clearly outweigh any negatives.

Our research has also found that 45 states have already formed DOTs incorporating a wide range of transportation activities similar to what we are recommending. In 1988, a reorganization study, prepared for North Dakota by the Upper Great Plains Transportation Institute at North Dakota State University, found that the following advantages of a DOT were actually identified as being most important by existing DOTs:

Improved Coordination  
Emphasis on Planning  
Resource Usage  
Multi-modal Perspective

We strongly feel that Montana can expect these same advantages as a result of our organizational recommendations for the creation of a DOT.

In addition, we would also like to point out that the National Governor's Association Working Group on State Motor Carrier procedures recommends simplification of state motor carrier registration and taxation procedures, as well as "one-stop" shopping. We feel our recommendations are consistent with this goal of significantly improved government services for motor carriers.

MMCA COMMENT; - MMCA AGREES WITH THE PROGRAM OF THE NATIONAL GOVERNOR'S ASSOCIATION WORKING GROUP ON STATE MOTOR CARRIER PROCEDURES AND RECOMMENDATIONS FOR SIMPLIFICATION OF REGISTRATION AND TAXATION PROCEDURES RESULTING IN "ONE STOP SHOPPING". WE AGREE THAT MOST OF THE GOALS OUTLINED IN THE MONTANA DOT FEASIBILITY STUDY ARE AIMED AT THAT OBJECTIVE AND MMCA SUPPORTS THE FORMATION OF A MONTANA DOT THAT INCLUDES THOSE OBJECTIVES. HOWEVER, MMCA WOULD OFFER ITS ABOVE LISTED RECOMMENDATIONS FOLLOWING SOME OF THE COMMENTS IN THE MEMO TO GOVERNOR STAN STEPHENS FOR INCLUSION IN THE FINAL DOT PROPOSAL.

Work is also underway on internal Department of Highways reorganization and a committee is preparing recommendations for Director Larsen. Although these recommendations are preliminary and are, to a degree, dependent on the results of the DOT study, the goals of the effort are to:

- 1) reduce the number of personnel who report to the Director,
- 2) enhance supervision of highways district office operations,
- 3) establish better lines of authority and responsibility for district expenditures, and
- 4) identify opportunities for privatization in cooperation with the efforts of the Ambassadors.

At this point, we feel our recommendations and the completion of the attached report concludes the first phase of your effort. At our March 23 interagency meeting, Chuck Brooke, Director of the Department of Commerce, suggested that we had come to the point where the public should become involved in the process. He suggested that a special committee representing affected agencies and boards, legislative leadership, and other interest groups be appointed by you to seek public input and deal with the concerns of special interest groups. Findings of this committee could then be used to formulate final DOT legislation for the upcoming session. We agree with his proposal.





*The Big Sky Country*

## MONTANA HOUSE OF REPRESENTATIVES

**REPRESENTATIVE BOB GILBERT**

HOUSE DISTRICT 22

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TAXATION  
NATURAL RESOURCES  
ENVIRONMENTAL QUALITY  
COUNCIL, CHAIRMAN

July 10, 1990

Charles A. Brooke, Director  
Department of Commerce  
1424 9th Avenue  
Helena, Montana 59620

Ref: Proposed D.O.T.

Dear Director Brooke,

Thank you for your response to my letter. I will attempt to give you some of my thoughts on this subject. As you may, or may not, know, I had a request in for a DOT bill in the 1989 Session. I did not follow up because the administration had wanted to do one on their own. My desire is to see a DOT that serves the people, not the Government.

I am a transportation person. I worked for a short time on the railroad shortly after high school, the same one my grandfather worked on for 42 years. I have been involved in the trucking industry for 34 years and am an active pilot. I am past president of the Montana Motor Carriers Association and a former director of the North Dakota Motor Carriers Association.

I want to make sure that the revenue raised by fuel taxes and GVW fees and other funds dedicated to the Highway Department for maintenance and construction are not siphoned off for other uses, for example, city busses, Senior Citizen and handicapped special transportation or any type of public transportation or studies for the same.

The Bingo Stamp program exists for no other reason than to raise revenue. You may hear differently but don't buy it. Bingo Stamp fees are assessed on all Commercial trucks operating in Montana on an Intra and Interstate basis. The state provides no services for these fees, they go into the General Fund. The ATA is looking at court action to force states to discontinue charging Bingo Stamp fees on Interstate Carriers. That would leave only the Intrastate Carriers paying the additional "tax". If the fees are not discontinued then it would be my preference that these fees be dedicated to the Highway Maintenance and Construction fund only.



## MONTANA HOUSE OF REPRESENTATIVES

**REPRESENTATIVE BOB GILBERT**

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The Safety Program that is now operated by the Dept. of Justice does a fair job, however it should probably be operated by the DOT. The truck inspection program that was transferred from the P.S.C. to the Highway Patrol is another matter. It is working and seems to be well run. To be very frank with you, the program was put where it is for two reasons; #1 the PSC was using it as a tool to build up their Department, they had no authority over Interstate Carriers as part of their normal function and they were not capable of handling the program. Hell, they can't even handle enforcement of PSC Authority regulations. #2 the motor carrier industry and the legislature didn't want it to be run by the GVW Department. This Department has a long history of Gestapo tactics and attitude. Admittedly, it has improved somewhat under Jesse Munroe and now Dave Galt, but the old hands are still there and Leopards don't change their spots. I feel the whole GVW Department should be dismantled with permits, GVW fees, etc. going to the DOT and the enforcement responsibilities going to the Highway Patrol. North Dakota did this several years back and it has worked out very well. At the same time the enforcement responsibilities of the PSC for transportation should also be transferred to the Highway Patrol. Now we are talking consolidation and efficiency. Also good service to the industry. These are some of the many things that need to be addressed if we want a DOT that will work.

The Aeronautics Division works very well and it rated as one of the best in the nation. It does lack for adequate funding and that must be addressed. At the present time we have several departments of the Government that operate aircraft, each independently of anyone else. All these could be coordinated through the Aeronautics Div. Oh yes, you will hear wailing and gnashing of teeth but will save the state, AND THE TAXPAYERS, lots of money in the long run. The present Aeronautics Commission works well and represents those who are a part of Aviation in Montana. And - - that is why it exists, to serve the users and the public. Mike Ferguson does a very outstanding job and is to be commended. I am aware of the disgusting attempt on the part of Mike Letson to discredit him.



*The Big Sky Country*

## MONTANA HOUSE OF REPRESENTATIVES

**REPRESENTATIVE BOB GILBERT**

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*I believe that a State Department of Transportation can be an asset to Montana, IF it is done with the idea of serving those it affects and the public. If not, most of the "one stop shopping" ideas can be passed without a DOT.*

*Thank you for your time in listening to my thoughts. If I can be of service please do not hesitate to call.*

*Sincerely,*

*Bob*

Bob Gilbert









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Forest  
Service

Region 1

Federal Building  
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Missoula, MT 59807

Reply to: 7100

Date: JUL 05 1990

Mr. Larry W. Larsen, Director  
Montana Department of Highways  
2701 Prospect Avenue  
Helena, MT 59620

Dear Mr. Larsen

This is in followup to the June 11 Hearing on the Governor's proposal to create a Department of Transportation (DOT) in Montana.

The Northern Region of the Forest Service works with the State of Montana in a variety of areas. The two areas which might be affected by the creation of a DOT in Montana are the Department of Highways and aviation as it relates to fire fighting support.

As the DOT proposal is being pursued and developed, we request that you include provisions whereby the Forest Service would continue to work direct with Department of Highways personnel concerning State Highways and the Forest Highway Program.

The Department of State Lands, Bureau of Forestry, and the National Guard supply vital aviation fire fighting support and need special administration and attention if they are to fulfill this role. This places additional responsibility and an increased burden on the organization that directs them. In addition, the Department of State Lands has several aircraft that belong to the Federal Government and are loaned to the State Forester. These are "special" in the respect that they can only be used for fire fighting and their administration is governed by a unique set of rules and regulations. As the DOT proposal develops, we ask you to consider these factors and insure that the ability of wildland fire fighters to obtain prompt and well trained air support is not comprised, and the need for attentive administration of the Federal aircraft on loan is not over looked.

Please ensure that committee chairman Chuck Brooke receives a copy of our comments.

Sincerely,

JOHN W. MUMMA  
Regional Forester





MONTANA PILOTS' ASSOCIATION  
INCORPORATED



Mr. Chuck Brooke, Director  
Montana Department of Commerce  
Box 501  
Helena, MT 59620-0501

June 29, 1990

Dear Mr. Brooke;

This letter is the written follow-up to the testimony I promised I would supply you during the public hearing in Helena on June 11.

First off, let me say that I was greatly disappointed in the article that came out in the Great Falls Tribune the day after my testimony. It was not the intention of my testimony, nor our position, to "object" to the creation of a Department of Transportation, as the headline of the article so boldly put it. I hope you and your committee did not receive my comments in the same vein as the reporter. Inaccurate journalism such as this does nothing to aid either of our efforts. I took the opportunity to clarify any misunderstandings the article may have generated with Mr. Huestis a couple of days after your hearings.

Again, as I testified during the hearing, we have three main points of concern in regards to the formation of a DOT.

Those concerns are:

1. The Aeronautics Division needs to be statutorially included at the division level in the new DOT.

This will assure that aviation issues will be heard and addressed. Without representation guaranteed at this level in the DOT organization, aviation issues could become lost in the maze of the Highway Department's bureaucracy.

2. Aviation fuel tax monies need to be dedicated to aviation needs.

The penny/gal fuel tax monies should be dedicated to aviation related issues or airport improvements and not be included in the general funding for the DOT.

These monies are paid exclusively by aviation users and therefore should be used for exclusively for aviation issues.

3. The Aeronautics Board should be retained.

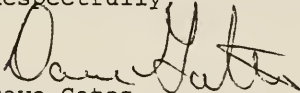
Aviation issues are complex and unique and the Aeronautics Division requires the kind of insight and guidance that only a qualified board can give. The current size of the Board should be reviewed for appropriateness.

The three issues I have mentioned; Organizational structure, Funding sources, and Board oversight are our main areas of concern regarding the formation of a Department of Transportation. If these concerns can be addressed during the creation of a Department of Transportation, I am sure the aviation groups I represent will be able to support the Governor in his efforts.

Aviation is close to a 600 million dollar business in Montana and needs to be watched and developed carefully.

If you need any clarification or additional information regarding our concerns please contact me.

Respectfully

A handwritten signature in dark ink, appearing to read "Dave Gates", written over a horizontal line.

Dave Gates

President, Montana Pilot's Association

Vice President, Aviation Organizations of Montana

cc: Dan Huestis  
Governor Stephens

# Montana Citizens Freight Rate Association

2807 Huckleberry Drive, Great Falls, MT 59404 (406) 452-7044

June 28, 1990

Charles Brooke, Director  
Department of Commerce  
1424 9th Ave  
Helena, MT 59601

Dear Charles:

Directors of the Montana Citizens Freight Rate Association met on June 27 to discuss the creation of a Department of Transportation in Montana. As you know, I presented testimony, earlier in Havre, on behalf of the MCFRA and the Montana Grain Growers Association. However, that testimony did not address the administrative structure of a D.O.T. We felt it would be helpful if we could provide some of our thoughts on that matter and called a meeting to do so.

After lengthy discussion on how the D.O.T. might be structured, the group abandoned that cause. Rather than give specific recommendations on the organization or structure we would like to present some general goals that should be met by whatever structure is adopted by the D.O.T.

- 1) D.O.T. should include an intermodal planning group that could address highways, rail, aeronautics and waterways in a coordinated way.
- 2) D.O.T. should contain a legal division or group that has expertise in the various transportation modes.
- 3) D.O.T. must contain a rail group that is adequately staffed and funded to carry out the stated mission of the current Transportation Division of the D.O.C. This division has been very successful in representing the interests of shippers in Montana. There must be a strong rail group that will be able to address problems and take advantage of opportunities in the future.

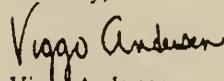
A good example of this need is the current rail car shortage. The Administration is facing resolution of this problem with very limited talents and resources. The state should have technical and legal staff that could address these kinds of issues as they arise.

- 4) D.O.T. Commission should be established giving consideration to all modes of transportation and geographics.

Our testimony at the hearing in Havre raised the question of whether transmission lines and pipelines should be included in a D.O.T. A representative of the Montana Power Company at our meeting indicated that they would like to see that jurisdiction remain with the Public Service Commission.

If I can be of further help, please do not hesitate to contact me. Please enter these comments in the proceedings of the hearings held on the creation of a D.O.T.

Sincerely,



Viggo Andersen  
President

enc: Attendance list

# Montana Citizens Freight Rate Association

2807 Huckleberry Drive, Great Falls, MT 59404 (406) 452-7044

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July 3, 1990

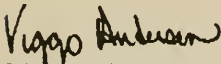
Charles Brooke, Director  
Department of Commerce  
1424 9th Ave  
Helena, MT 59601

Dear Charles:

In my letter to you, dated June 28, one of the major points the directors of the Montana Citizens Freight Rate Association wanted to make regarding the administrative structure of a D.O.T. was omitted. I apologize for the omission and ask that you include the following statement in the record if possible.

It was the consensus of the MCFRA Board that it be extremely important that a D.O.T. director be responsive to the will of the D.O.T. Board; unlike the present unsatisfactory arrangement of the Aeronautics Board.

Sincerely,

  
Viggo Andersen  
President

Attendance of MCFRA Directors Meeting June 27, 1990

Duane A. Olson

All Bell

Jim Christianson

Steve Chambers

Skip Seaver

Viggo Anderson

George Paul

Randy Johnson

Con Agra Fertilizer Co.

Metco Kenworth Inc.

Montana Wheat and Barley Committee

Evans Grain & Montana Grain Elevator Assn

Montana Power

Montana Grain Growers Assn.

Montana Farmers Union

Montana Grain Growers Assn





Comments of Viggo Andersen

representing the

Montana Grain Growers Association & Montana Citizens Freight Rate Association

on the

Creation of a Department of Transportation in Montana

June 12, 1990

Havre, MT

My name is Viggo Anderson. I am a wheat and barley producer from Cascade County. I am also the President of the Montana Citizens Freight Rate Association and the Chairman of the Montana Grain Growers Association's Transportation Committee. I speak, today, on behalf of both organizations.

The MGGA has long supported a unified approach to transportation matters within our state. Our resolutions state: "We support the placement of all transportation matters under one administrative agency to be directed by a statewide board. Such a system must allow for maximum input by affected industries and geographic areas for all transportation modes."

We believe creating a Department of Transportation (DOT) in Montana makes sense and can be much more efficient in addressing transportation problems and opportunities than our current system.

We are, however, concerned about maintaining a strong division within a DOT that will handle rail transportation matters. Most of the commodities, we produce, are shipped to domestic or export markets by rail. MGGG was instrumental in the creation of the current Transportation Division within the Commerce Department and it is extremely important to us that we maintain a strong division that can handle rail issues.

Montana is in a unique position. While we are extremely dependent on rail transportation to move our commodities, there is really only one carrier serving the state. This situation can cause problems for shippers and producers. It can also provide opportunities. If a well-staffed Rail Division is part of a DOT, those problems and opportunities could be quickly and effectively addressed.

As an example, there are certain to be additional rail line abandonments in Montana. If we have a strong Rail Division, we would have the expertise to determine how to spend State monies where they would provide the best return. Should the state look at funding branch line renovation or upgrading and rebuilding area highways?

We have several other questions regarding the formation of a DOT. What would be the administrative structure? Would there be an advisory board? Would pipe lines and power lines fall under the DOT's jurisdiction?

We are appreciative of this Administration's efforts in creating a Department of Transportation in Montana. As you move toward putting together enabling legislation, we would offer our help. The MCFRA membership includes many of the major rail and truck shipping interests and would be interested in helping develop the "nuts and bolts" of this project.

# WIFE Women Involved in Farm Economics

RE- THE DEPARTMENT OF TRANSPORTATION FEASIBILITY STUDY.

GLENDIVE, MT. June 12th 1990

My name is Mary Nielsen, and I represent WIFE as both State and National Transportation Chairman, having held that office for a period of about 12 years, during which time I have assisted the organization in developing a comprehensive transportation policy.

We firmly beleive that the ntaion needs a balanced transportation system, with all modes being utilized efficiently in the best interest of the country as a whole.

A recent experience led me to believe that this State needs an umbrella group- a Department of Transportation. Last year, when the DOC Transportation Division lost the Bureau of Litigation and Analysis (in spite of HB 854 of the 47th legislative session that directly mandates such an office), WIFE was among those who could foresee that this would cause problems for the states' shippers.

When the BNRR petitioned to abandon a segment of branch line from Scobey to Opheim in January of this year and the shippers decided that they wanted to protest, there was no legally qualified State employee to assist those shippers in their protest. So an out of State attorney had to be brought in. That attorney wanted information from the State, and had difficulty locating a Dept. of TRansportation. He reached the Public Service Commission, who then did participate in the protest, but the major office that had all of the necessary information and expertise was over in the Department of Commerce. And this was the office that, in spite of the lack of a Litigation and Analysis Bureau, had the information that he needed, and were extremely helpful to both the attorney and to the protestants.

Their office is supposed to "provide representation of shippers and the State before the ICC and the court on rate issues, branchline abandonments and service." With the exception of the legal expertise, this is what they did for those shippers. The ICC decision is still pending.

Had the attorney for the defendant been able to be directed to the correct office through a single DOT contact, it would have saved time, although the shippers appreciated the assistance of the PSC.

Both the DOC and the PSC have Transportation Divisions, but they have very little in common, although both respond to specific needs within their own department.

In studying the Final Draft of the DOT Feasibility Assessment, I found- with the exception of the DOH study- that the pros and cons found by the other departments who also did a study amounted to a total of 15 "Plusses" and 26 "minusses". This in itself is not to indicate that a DOT is not a good idea, but it certainly does lend itself to the conclusion that the way plans are presently being presented are not necessarily the way that would be ideal.

The strengths and weaknesses of all departments that are being considered for inclusion are to be taken into consideration. Having worked with the DOH; the PSC, and mostly the DOC- Transportation Division over the years, I am constantly impressed with the open communication between the agencies.

At the various USDA-OT seminars that I have been privileged to attend, Montana's Transportation people are highly respected. At many of these meetings, I was the only person from Montana, and yet have been told repeatedly that transportation personnel from other states are impressed with the activities of MT. in the field of transportation. It is always a pleasure to be able to say that I work with Montana's Transportation people.

Our comparatively small DOC Transportation Division, with 13 FTE's, is widely known, not only for its work on the McCarty Farms Suit ( at that time, the L & A Bureau was still in existence) but for all of the work that it has done on behalf of Montana and its shippers.

This Department has achieved so much over such a broad spectrum in the years since it was absorbed into the DOC that it should have been called a DOT in the first place.

That office is charged with "working with Montana's producers and shippers in preserving and maintaining a viable and competitive transportation system." In addition to that, they have worked very hard on developing the latest means of Transportation- Intermodal Transfer. In that area, they have done much to broaden Montanas' access to markets which in turn has meant economic development for the State. I am sure that few people who read the report were aware of their concern with Waterways, but the work that they have done over the years in monitoring the Columbia- Snake River system and the West Coast Ports was especially important to grain shippers. This work will probably be gaining momentum if the Rail-to-Barge- to Port plans continue to develop. Car shortages have long been a concern of the division, and this scenario could possibly be of help for that situation, but we need their expertise to monitor the development.

For many years, if shippers have experienced problems, the Transportation Division has been a helpful assistant, while maintaining good relations with the railroads and other States. Their efforts always seems to be involved with situations that mean multi-millions of dollars. They recognize that agriculture pays the transportation costs on all it produces and on all it consumes without being able to pass those costs on, and every dollar that is lost to the farmers of the State is also lost revenue for the State.

I was privileged to be invited to the Grand Opening of the Port of Butte- Silver Bow Hub facility, and was proud that WIFE supported them in their far-sighted efforts to bring that facility into reality. It is a real service to the states' commerce. Hopefully, there will be more such 'hub facilities' for intermodal transportation developed, in order that Montana can find more markets for our production. Those kind of developments make it possible for the State to encourage more business development in Montana.

I was pleased to see that the Highway Department was responsible for developing the Feasibility Study for the DOT. It needed to be done, and it is great that the Governor is interested in promoting efficiency within our State's agencies.

However, in my opinion, this is not a step which should be taken in a hurry. There are too many questions left unanswered.

#### COMMENTS.

1/ At a time when the State is experiencing great financial need, this will be an expensive undertaking, UNLESS it can be proven that there will be immediate financial benefits. And that does not seem to be possible, according to page 64, where the DOH says, "few savings will be immediate." And since the State's financial problems ARE immediate, can not a better plan be developed to avoid incurring large moving expenses?

2/ Since there are now 1934 employees in the DOH, with great responsibilities, is it wise to try to amalgamate them with other modes, other responsibilities? Last year, the Transportation Division (DOC) lost 3-FTE's, including an ICC practitioner. that was 19% of their staff. Could the DOH have 19% of its staff cut and still manage to keep up with those responsibilities? There is no way that our highway system could be kept up with that kind of staff cutting. But in their study, the DOH are already talking about additional staff that will be necessary in a DOT. Including more legal staff. If entire departments are to be moved under the present plan, would it not be wiser to try to utilize the services already serving those departments?

The idea of combining the agencies is a good one - a call to a DOT from anyone, anywhere in the country could put them in touch with the right people immediately, but is it necessary that they have to be all in one



building? Can they still not work as they have been. Some of the recommendations have been that some offices would work better in the DOH building- the "bingo stamps" office, for instance ( although that too, requires more staff). In such cases, by all means, make an effort to get them into the area where they will be most efficient, within the DOH.

The report shows that there are very few instances of duplication of work, meaning that obviously there is no savings to be realized because of that. Those departments that are going to be improved could be moved, but maybe some of the other activities of other offices can be coordinated better, without the stress of moving.

It appears to me that should the Transportation division of the DOC be moved out of that department, that the DOC will lose a great deal of internal expertise that is necessary to the function of that agency as it endeavors to assist economic development, either for new, incoming businesses or for those who wish to expand and are already in the State. The present staff has acquired much expertise as it has worked together through many complicated issues in the past ten years. These people are transportation specialists, and the lines of communication between the DOC and their new office, should they be moved, might be very busy.

CONCLUSION. WIFE supports the Governor in his efforts to condense agencies, making them more efficient, and economical.

However, from the vast majority of studies in the Feasibility Study book, there seems to be no real basis for actual physical movement of some of these departments based on duplication of activities. That fact, and the fact that there is already very good communication between all of the agencies, plus good cooperation, makes such an expensive and extensive operation of questionable value at this time of extreme financial difficulty in the State.

RECOMMENDATION. Could there not be a substitute program, incorporating some of the following ideas?

1/ An umbrella DOT, headed by three Directors (similar to the ICC Commissioners: Highways (Chmn), Aeronautics, and Rails and Development. ( or another such name.) Under this scenario, some of the proposed efficiencies in the study could be made by transferring them into the DOT ( DOH building) from other agencies, but Aeronautics and the DOC- TD would remain in their present location.

2/ The present Highway Commissioners would then be Transportation Commissioners Appointed from among citizens who have expertise in the various transportation fields. This would benefit the new DOT, to have such broad expertise to call upon.

3/ If at a later date, the moving of the PSC to another building should become necessary and feasible, then there could be more movement of other offices that could benefit the DOT by being in the same building, increasing efficiency.

In a letter from Chuck Brooke, he notes that "the governments committment to a coordinated multi-modal transportation policy means that all modes will be properly represented in a new DOT and in no way be subordinated to any other mode simply based on the size or the staffing of that program." That statement is excellent, and is commendable, but I am not sure that it is achievable.

An umbrella DOT, with commissioners who are familiar with all modes and problems, and three directors, would achieve the goals of more efficient public service ( although WIFE has no complaints about it at this time, with the exception of the L & A Bureau!) and better planning coordination. It seems doubtful whether the move that is proposed will be a more cost effective operation, and it is a very expensive step to take in order to find out!!

WIFE supports the ideals, but questions the feasibility of carrying through the proposal in its' proposed format at this time. There is no hurry- let the State feel its' way through to a 'one-stop' transportation concept simply by starting out slowly with an umbrella organization first, coordinating activities gradually.

We feel that we have one of the best transportation systems in the coutry at this time, and have nothing but praise for all of the component parts!

Mary W. Nielsen  
Mary W. Nielsen,  
Transportation Chair, WIFE.







*The Big Sky Country*

MONTANA HOUSE OF REPRESENTATIVES

REPRESENTATIVE DOROTHY A. CODY

HOUSE DISTRICT 20

HELENA ADDRESS:  
CAPITOL STATION  
HELENA, MONTANA 59620

HOME ADDRESS:  
P.O. BOX 973  
WOLF POINT, MONTANA 59201

COMMITTEES:  
APPROPRIATIONS  
HUMAN SERVICES  
SUBCOMMITTEE  
ADMINISTRATIVE CODE  
DEPARTMENT OF  
FAMILY SERVICES  
LOCAL ADVISORY  
COUNCIL

*June 2, 1990*

*Mr. Chuck Brooke,  
Montana Department of Commerce  
1424 9<sup>th</sup> Avenue  
Helena, Mt. 59620-0501*

*Dear Mr. Brooke,*

*I will be unable to attend the hearings on the proposed DOT so would like to take this means of submitting a comment.*

*Although I agree that Transportation is a vital part of Montana's ability to function, I can not agree that establishing another Department in State Government is either possible or practical at this time.*

*The most interesting part of the proposal is administrative cost savings and I couldn't disagree more. Historically, when*



*The Big Sky Country*

# MONTANA HOUSE OF REPRESENTATIVES

REPRESENTATIVE DOROTHY A. CODY

HOUSE DISTRICT 20

HELENA ADDRESS:  
CAPITOL STATION  
HELENA, MONTANA 59620

HOME ADDRESS:  
P.O. BOX 973  
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ADMINISTRATIVE CODE  
DEPARTMENT OF  
FAMILY SERVICES  
LOCAL ADVISORY  
COUNCIL

2/

a New Department has been established, we end up with more Government rather than less. The State will be experiencing a large deficit in next year's Legislative Session and it certainly isn't going to be the proper time to add anything.

I haven't heard of any great public out-cry to increase taxes to support this proposal and Consolidating functions from other departments has been tried before with only growth as an outcome. I could cite numerous examples for you but do not have the space to do so here.

There are probably many things we could do to make life better in Montana for Montanans but until it's citizens and Corporations are willing to pay the bill, the Legislature and the Governor are tied to their constitutional wires.

Sincerely,  
Rep. Dorothy A. Cody

HARRY A. SIMONS, Chairman  
JOHN ALSTAD, Commissioner  
GENEVA R. SISK, Commissioner  
RAE KALBFLEISCH, County Attorney  
JENNY JEAN WALTER, Clerk and Recorder  
BRYAN L. ANDERSON, Sheriff  
JAMES C. FARRAR, Justice of the Peace  
COMMISSIONERS, 406-434-5121



PENNY UNDERDAHL, Clerk of Court  
DIANA L. FELTON, Treasurer  
CORRINE MERHAR, Assessor  
LOUISE LORENZEN, Co. Supt.  
JERRY MURRAY, Coroner  
TONY LUNDA, Public Administrator  
CLERK AND RECORDER, 406-434-2232

## COUNTY OF TOOLE

226 1st South — Toole County Courthouse  
SHELBY, MONTANA 59474

May 2, 1990

The Honorable Marc Racicot  
Attorney General, State of Montana  
Justice Building  
215 N. Sanders  
Helena, Montana 59620

Dear Mr. Racicot,

Please accept this letter as opposition to the state assumption of Motor Vehicle Registration and Titling.

County Commissioner District 4 and District 5, which we represent, is comprised of Glacier, Toole, Liberty, Hill, Blaine, Chouteau, Cascade, Teton and Pondera counties. Many concerns have been voiced by these commissioners at their recent district meeting. They have, by unanimous vote, expressed their support to have vehicle registration remain under individual county control, as it is now.

Several of our counties see the services of the one driver examiner once a week, or even twice a month. Many counties have no extra work space for the examiner to set up office procedures. Presently counties now have people trained to handle the licensing in conjunction with their other duties in their respective offices.

The lack of convenience for our constituents are the basis for our opposition and the additional costs incurred by the proposal.

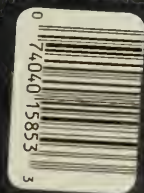
Thank you for your consideration.

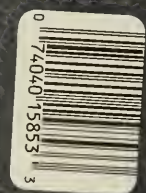
Robert W. Moog, Chairman District #4

  
Geneva R. Sisk, Chairperson District #5

cc: Governor Stan Stephens ✓  
Dean G. Roberts, Administrator Motor Vehicle, Justice Dept.  
MACO  
Counties of District 4 and 5







AUTUMN  
6125  
MADE IN U.S.A.